

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDREW NICKELS,

Defendant.

Case No. 23-cr-20434

Hon. Laurie J. Michelson

EXHIBIT C



July 2, 2024

Judge Laurie J. Michelson  
Eastern District of Michigan  
United States District Court  
Theodore Levin U.S. Courthouse  
231 W. Lafayette Blvd., Room 737  
Detroit, MI 48226

**Victim Impact Statement: Tina Barton**

Judge Michelson,

You will likely hear from other individuals and organizations related to the election administration field that will speak to how important Tina Barton's leadership is to our profession, especially in Michigan.

While we knew Tina prior to her joining our team in June 2022, we're now fortunate to have been part of her team, and we've gotten to know her on a more personal level. In this letter, we'd like to focus on our relationships with her as our friend more than as a colleague.

We see more than the consummate professional. We see the doting grandmother, participating in video meetings while her granddaughter has her face pressed against the door glass in the background. We know that every minute of her vacation time is spent at theme parks with her husband, kids and grandkids. We see the tremendous love she has toward not only her family but also anyone who is fortunate enough to cross paths with her.

We know she grew up in a family with little money or status, her mother raising her as a single mom for a time. We know how deeply important her faith is to her. Her upbringing and her faith grounds her worldview. Whatever accomplishments she has come to professionally were earned through grit, hard work and a deep dedication to fairness.



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When Tina was threatened, something innate was stolen from her and her family. The experience will never be far from her, her family and others who love her. Because of its deep impact on her psyche, it will forever inform her decisions, consciously or subconsciously. No matter what, she will carry its traumatic impact with her. Beyond the terror that she felt in the days and weeks after being threatened, this ongoing effect represents the impact on her.

For all that was taken, however, Tina has been dedicated to bringing good from her experience as well. Traveling around the country the past two years, she's shared her story with countless election officials. Particularly, her work has focused on fostering relationships between election officials and law enforcement, as well as bolstering wellness and resilience efforts for election officials.

Of course, sadly, Tina is not alone. We talk to many election officials across the country who have experienced similar threats. Even just on our small team of former election officials, Tina is not the only one with a story like this. Experiencing threatening behavior has become endemic to the election administration profession — both among those who continue to serve in government directly and those who work for companies and organizations that support it.

We hope that you will impose a sentence reflective of Tina's wishes, and we hope that by doing so, a message is sent to those who consider similar actions moving forward. In addition to the punishment that is deserved, we hope that Mr. Nickels receives the help that he needs.

Thank you in advance for your consideration of this letter.

Respectfully,

Jennifer Morrell  
Chief Executive Officer and Co-Founder

Noah Praetz  
President and Co-Founder

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